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Attorneys for The Trial Lawyers College

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING
CASPER DIVISION

THE TRIAL LAWYERS COLLEGE, a)
nonprofit corporation)

Plaintiff,)

v.)

GERRY SPENCES TRIAL LAWYERS)
COLLEGE AT THUNDERHEAD)

RANCH, a nonprofit corporation, and)

GERALD L. SPENCE, JOHN ZELBST,)

REX PARRIS, JOSEPH H. LOW, KENT)

SPENCE, and JOHN DOE, individuals.)

Defendants.)

CIVIL ACTION NO. 1:20-cv-0080

JUDGE CARSON

MAGISTRATE JUDGE CARMAN

CONSENT MOTION FOR PROTECTIVE ORDER

NOW INTO COURT, through undersigned counsel, comes Plaintiff the Trial Lawyers College (“Plaintiff” or “TLC”) who respectfully moves the Court to enter the attached proposed protective order in this matter. The parties are engaged in written discovery in accordance with the Scheduling Order. As the parties have begun preparing their respective document productions, it has become apparent that certain confidential and/or extremely sensitive information may need to be produced in the discovery process. To facilitate the exchange of that information, the parties have agreed on a proposed protective order and respectfully request that the Court enter it as its Protective Order in this matter. Undersigned counsel has conferred with counsel for Defendants, who consent to the form and entry of the attached proposed protective order.

Respectfully submitted,

THE TRIAL LAWYERS COLLEGE

/s/ Christopher K. Ralston

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By: /s/ Patrick J. Murphy
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**ATTORNEYS FOR PLAINTIFF THE TRIAL
LAWYERS COLLEGE**

CERTIFICATE OF SERVICE AND CONFERRAL

I hereby certify that true and correct copy of the foregoing document has been served electronically by transmission to an electronic filing service provider for service through the Court's CM/ECF system to all parties on September 29, 2020. I further certify that on September 28, 2020, I conferred with Defendants' counsel Timothy Getzoff. Defendants consent to the entry of the attached protective order.

/s/ Christopher K. Ralston
Christopher K. Ralston